

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**THIRD SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS NIETO
(UPS/USPS-T2-27 through 44)**

(September 17, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Nieto (UPS/USPS-T2-27 through 44).

Respectfully submitted,



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Of Counsel.

**THIRD SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS NIETO**

UPS/USPS-T2-27. Please refer to LR-H-82. Provide a detailed description of the facility type, classes of mail processed, and the activities performed for IMPs.

UPS/USPS-T2-28. Please refer to LR-H-82, DMM section E652, Exhibit 1.5, and line 17, page 2, of your testimony.

- (a) Provide a detailed definition of "miles traveled" on line 17, page 2, of your testimony.
- (b) For each Facility - Parent Post Office pair shown in Exhibit 1.5 in DMM section E652, provide:
 - (i) The "miles traveled" as defined in (a) above for mail that was loaded at the BMC/ASF (Facility) and unloaded at the Parent Post office for each pair shown;
 - (ii) The miles that would be used for TRACs samples for calculating cubic-foot-miles for mail loaded and unloaded between these facility pairs;
 - (iii) The highway miles between these facility pairs;
 - (iv) The Great Circle Distance (in miles) between these facility pairs.
- (c) Please explain any differences in miles for each facility pair as provided in (b)(i), (b)(ii) and (b)(iii) above.
- (d) For each Facility and Parent Office shown in Exhibit 1.5 in DMM section E652, provide the name, 3 or 5 digit NASS facility code, and 3 digit alpha type.

**THIRD SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS NIETO**

UPS/USPS-T2-29. Please refer to LR-H-82, pages 5 and 11.

- (a) Are there TRACs sample segments where the calculation of GCD between origin (OCODE) and destination (DCODE) is:
 - (i) 0?
 - (ii) Less than 1?

Please explain any no answer.

- (b) Please describe the process/estimation procedures for determining DIST for a sample segment, and provide actual examples when
 - (i) $GCD = 0$
 - (ii) $GCD = <1$
 - (iii) A DIST value other than the calculated GCD is used.

UPS/USPS-T2-30. Please refer to LR-H-82, part 4, page 8. Please confirm that the "PERCONT" variable in the data file TRACSSSMN.Z.HIGHWAY.PQ*96.SURVEY.TEXT, which is described as "Percentage of container filled with items of same item type," contains percents expressed as whole numbers. For example, if a container was filled with 50% of items of the same item type, the variable for that observation would contain "50."

UPS/USPS-T2-31. Please refer to LR-H-82, part 4, pages 152-199, and to the SAS program code line 278 at page 164 for PQ 1 FY96, the SAS program code line 278 on page 174 at PQ 2 FY96, the SAS program code line 278 on page 184 at PQ 3 FY96, and the SAS program code line 238 at page 194 at PQ 4 FY96.

**THIRD SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS NIETO**

- (a) Please confirm that the purpose of the SAS code lines referenced above is to set the value of the CUFT variable equal to the CUFT variable divided by the TOTCUFT variable multiplied by the cubic feet of the container filled with items of same item type.
- (b) Please confirm that the SAS code referenced above calculates the cubic feet of the container filled with items of same item type by multiplying the PERCONT and CONTCUFT variables.
- (c) Please confirm that multiplying the PERCONT and CONTCUFT variables does not equal the cubic feet of the container filled with items of same item type because the PERCONT variable expresses percents as whole numbers rather than decimals.
- (d) Please confirm that multiplying the PERCONT and CONTCUFT variables and dividing by 100 is the correct calculation of cubic feet of the container filled with items of same item type.

UPS/USPS-T2-32. Please refer to page 4 of LR-H-82, and to the National Air and Surface System (NASS) Report Users Guide (Handbook PO-503) dated 10/3/83.

- (a) Please confirm that the file LAXSTN.PS272D13 (a temporary file which contains all NASS planned route records available as of a certain date) was created for each Postal Quarter in 1996. If not confirmed, please explain.
- (b) For what dates were these four files created?
- (c) Please provide the following reports in hard copy and in machine-readable format with effective dates as requested in (b) above, for all transaction codes:
 - (i) LAT274P2 (Surface Master)
 - (a) for all AMC/AMFs
 - (b) for all BMCs

**THIRD SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS NIETO**

- (c) for all PLDs
- (ii) LAT277P1 (Intra-Area Transportation Report)
 - (a) for all AMC/AMFs
 - (b) for all BMCs
 - (c) for all PLDs
- (iii) LAT420P1 (Transportation Master by Key with Dispatch Hooks) for all origin-destination pairs where either is an AMC/AMF
- (iv) LAT421P1 (Transportation Master by Key without Dispatch Hooks) for all origin-destination pairs where either is an AMC/AMF
- (v) LAT488P1 (Airport Transportation Requirements) for all AMC/AMFs
- (vi) LAT500P1 (Surface Transportation Master List) for the area of administrative responsibility that includes Chicago, IL
 - (a) If any of these reports (as identified in the NASS Report Users Guide) no longer exists, please identify and provide the information that the report would have provided.

UPS/USPS-T2-33. Please refer to LR-H-78, at page 11, identifying

TRACS mailcodes.

- (a) Confirm that mailcode LL comprises all DBMC Parcel Post mail.
- (b) In your opinion, how reliable are TRACS proportions for mailcode LL relative to Parcel Post mailcodes in total (mailcodes KK, LL, and P combined)? Please include in your answer a discussion of the reliability of identification of DBMC rated parcels as distinguished from other parcels at the different destination facilities.

**THIRD SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS NIETO**

UPS/USPS-T2-34. Please refer to LR-H-82, part 1, page 6 and to the data file ACR94.COSTCFM.FLAT.TEXT.

- (a) Please provide a machine-readable copy of the data file ACR94.COSTCFM.FLAT.TEXT.
- (b) Please describe the method used to calculate the COSTCFM variable.
- (c) Does a cubic foot, defined with respect to the COSTCFM variable, represent a cubic foot of actual mail or a cubic foot of vehicle capacity? For example, if a truck with 2,400 cubic foot capacity contained 1,200 cubic feet of mail, would the COSTCFM variable be based upon 1,200 cubic feet of mail actually moved or 2,400 cubic feet of capacity of the vehicle?

UPS/USPS-T2-35. In reference to the TRACS software TRACS.EXPAND.HIGHWAY.CNTL (HWY11), please explain the logic of the “capacity utilization weighting factors” applied to intra-SCF observations by facility category (“FACCAT”) at lines 144 to 147. Why is a similar adjustment not applied to the other highway account codes?

UPS/USPS-T2-36. Please refer to the TRACS software TRACS.EXPAND.HIGHWAY.CNTL (HWY11).

- (a) Please confirm that the costs for the observed movements of unloaded mail for a given account category (e.g., intra-SCF) and destination facility category (FACCAT, e.g. “inbound SCF or BMC”) are expanded to the sample frame of all transportation segments by account and distribution facility category including segments with zero capacity utilization or zero unloading of mail at the destination facility.

**THIRD SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS NIETO**

- (b) Please confirm that this expansion is performed at the FACCAT level, prior to combining expanded costs by FACCAT to determine mailcode distribution keys at the account category level.
- (c) Please explain any nonconfirmation, and the rationale for charging the costs of moves with zero capacity utilization or unloading of mail to the nonzero observations at the FACCAT level instead of at the level of all observations by account category.

UPS/USPS-T2-37. Please describe in detail how TRACS will affect (and be affected by) the PMPC network.

UPS/USPS-T2-38. Please refer to LR-H-82, part 1, pages 1-56, TRACS.DESIGN(HWY1) (PQ 1 FY96 and PQ 4 FY96).

- (a) Please confirm that this program calculates great circle distance (GCD) for the sample frame. If not confirmed, please explain.
- (b) Please confirm that the program should be able to calculate GCD for all the observations in the sample frame. If not confirmed, please explain.
- (c) Please explain and provide an example of how the program calculates GCD for NASS codes that are not listed in the LATLON.LOOKUP.TEXT data file.
- (d) Please explain and provide an example of how the program calculates GCD for NASS codes that are not listed in the LATLON.LOOKUP.TEXT data file or hard coded into the program with a "DATA ... CARDS" statement.
- (e) Please explain the "INVESTIGATED BY PW PERSONNEL" comment on line 488 of page 33.

UPS/USPS-T2-39. Please refer to LR-H-82, part 1, page 35, and to lines 558-560 of the source program TRACS.DESIGN(HWY1) (PQ 1 FY96).

**THIRD SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS NIETO**

- (a) Please explain why the "IF – THEN" statement sets distance equal to 26.
- (b) Please explain why and how ODIS is the basis for setting distance equal to 26.

UPS/USPS-T2-40. Please refer to LR-H-82, part 4, page 164, and to lines 280-296 of the source program TRACS.EXPAND.HWY.PQ196.CNTL (HWY1).

- (a) Please confirm the SMCONTCF variable represents the cubic feet utilized by all the items in a container. If not confirmed, please explain.
- (b) Please confirm that the CONTCUFT variable represents the cubic feet of a container. If not confirmed, please explain.
- (c) Please confirm that dividing the SMCONTCF variable by the CONTCUFT variable provides a good estimate of the utilization of a container. If not confirmed, please explain.
- (d) Please confirm that the SMCONTCF variable should never be greater than the CONTCUFT variable. If not confirmed, please explain.
- (e) Please confirm that the SMCONTCF variable is greater than the CONTCUFT variable in the data set FORM3S at line 294 in 3,439 out of 8,522 observations. Please explain your response and how to correct this.
- (f) Please confirm that your responses are also applicable to PQ 2 FY 96, PQ 3 FY 96, PQ 4 FY96. If not confirmed, please explain.
- (g) Are your responses also applicable to the Air, Amtrak, Eagle, and Rail TRACS programs? Please explain.

UPS/USPS-T2-41. Please refer to LR-H-82, part 4, page 164, and to line 275 of the source program TRACS.EXPAND.HWY.PQ196.CNTL (HWY1).

**THIRD SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS NIETO**

- (a) Please confirm that the intention of the above referenced line of code is to set the data set FORM3S equal to the data set HIT. If not confirmed, please explain.
- (b) Please confirm that the code does not set the data set FORM3S equal to the data set HIT. If not confirmed, please explain.
- (c) Please confirm that the correct line of code should read "DATA FORM3S; SET HIT;" and will set the data set FORM3S equal to the data set HIT. If not confirmed, please explain how to correct this.
- (d) Please confirm that your responses are also applicable to PQ 2 FY 96, PQ 3 FY 96, PQ 4 FY96. If not confirmed, please explain.
- (e) Are your responses also applicable to the Air, Amtrak, Eagle, and Rail TRACS programs? Please explain.

UPS/USPS-T2-42. Please refer to LR-H-82, part 4, page 164, and to lines 265-267 of the source program TRACS.EXPAND.HWY.PQ196.CNTL (HWY1).

- (a) Please confirm that the intention of the above referenced line of code is to calculate the TOTCUFT variable in the data set TOTAL2. If not confirmed, please explain.
- (b) Please confirm that the TOTCUFT variable in the data set TOTAL2 should be equal to the total cubic feet of a sampled item. For example, for all items of CTYPE equal to "F" (flat tray), TOTCUFT should equal 1.49 (the cubic footage of a flat tray). If not confirmed, please explain.
- (c) Please confirm that the TOTCUFT variable in the data set TOTAL2 is equal to the total cubic feet of a sampled item. For example, for all items of CTYPE equal to "F" (flat tray) TOTCUFT equals 1.49 (the cubic footage of a flat tray). If not confirmed, please explain.
- (d) Please confirm that your responses are also applicable to PQ 2 FY 96, PQ 3 FY 96, PQ 4 FY96. If not confirmed, please explain.
- (e) Are your responses also applicable to the Air, Amtrak, Eagle, and Rail TRACS programs? Please explain.

**THIRD SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS NIETO**

UPS/USPS-T2-43. Please refer to LR-H-82, part 4, page 164, and page 164 of part 4 of library reference to lines 269-274 of the source program TRACS.EXPAND.HWY.PQ196.CNTL (HWY1).

- (a) Please confirm that the intention of the above referenced lines of code is to create the HIT data set by merging the FORM3S data set and the TOTAL2 data set. If not confirmed, please explain.
- (b) Please confirm that the TOTCUFT variable in the data set HIT should be equal to the total cubic feet of a sampled item. For example, all items of CTYPE equal to "F" (flat tray) TOTCUFT should equal 1.49 (the cubic footage of a flat tray). If not confirmed, please explain.
- (c) Please confirm that the TOTCUFT variable in the data set HIT does not equal the total cubic feet of a sampled item. For example, the TOTCUFT variable only equals 1.49 in 608 of 1,873 observations with CTYPE equal to "F" (flat tray). Please explain your response. If confirmed, please explain how to correct the above referenced code.
- (d) Please confirm that your responses are also applicable to PQ 2 FY 96, PQ 3 FY 96, PQ 4 FY96. If not confirmed, please explain.
- (e) Are your responses also applicable to the Air, Amtrak, Eagle, and Rail TRACS programs? Please explain.


UPS/USPS-T2-44. Please refer to LR-H-82, part 4, page 162, and to the FORM3S data set at line 144 of the source program TRACS.EXPAND.HWY.PQ196.CNTL (HWY1).

- (a) Please confirm that the WT variable represents the actual weight of a particular class of mail in an item (a flat tray, for example). If not confirmed, please explain.

- (b) Please confirm that TOTWT represents the total weight of an item (tare weight plus actual mail weight). If not confirmed, please explain.
- (c) Please confirm that the tare weight of an item should be greater than zero. If not confirmed, please explain.
- (d) Please confirm that the TOTWT variable should always be greater than the WT variable. If not confirmed, please explain.
- (e) Why does the WT variable equal the TOTWT variable in 1,725 out of 8,522 observations in the FORM3S data set referenced above? How can this be corrected?
- (f) Please confirm that your responses are also applicable to PQ 2 FY 96, PQ 3 FY 96, PQ 4 FY96. If not confirmed, please explain.
- (g) Are your responses also applicable to the Air, Amtrak, Eagle, and Rail TRACS programs? Please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.


Albert P. Parker, II

Dated: September 17, 1997
Philadelphia, PA